



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

DEC 18 2015

Gerald Pepper
Pechiney Cast Plate, Inc
2700 Daybreak Parkway
South Jordan, Utah 84095

Re: PCB Cleanup Completion at Former Pechiney Cast Plate Facility

Dear Mr. Pepper:

Thank you for working with the U.S. Environmental Protection Agency, Region 9 (EPA) to cleanup polychlorinated biphenyls (PCBs) in soils and concrete at the Former Pechiney Cast Plate, Inc. (Pechiney) facility in Vernon, California. This letter acknowledges completion of the PCB cleanup at the 26-acre Pechiney property (Property). However, some obligations still remain that must be fulfilled as required in this letter.

EPA issued a risk-based Approval to Pechiney under 40 CFR § 761.61(c) of TSCA on July 2, 2010, which allowed for implementation of a "PCB Remedial Action Plan" and established conditions for the PCB cleanup and site reuse. This Approval was subsequently modified on July 1, 2011 and February 4, 2014. In addition, consistent with the definition of Cleanup Site in 40 CFR 761.3, the Property and adjacent areas to where PCBs migrated constitute the "PCB Cleanup Site."

Based on a review of completion reports and additional information provided by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), EPA has determined that the PCB cleanup within the boundaries of the Property has been implemented and completed in accordance with the conditions of the Approval. The Approval, modifications, completion reports, and correspondence that serve as a basis for these determinations are in the enclosed table.

Although the cleanup has been completed within the Property boundary, Pechiney still has remaining obligations under the EPA Approval that must be fulfilled. The conditions of Approval shall remain binding upon Pechiney and/or the new owners of the property until the following obligations are met.

1. **Offsite Impacts.** Previous sampling results indicate that PCBs have migrated to the adjacent property owned by Union Pacific Railroad (UPR). Thus, this portion of the UPR property must be remediated under the terms of the Approval. Pechiney must negotiate an appropriate cleanup level with UPR for this area, subject to EPA approval. Amec/Pechiney has informed EPA that additional sampling has been delayed due to access issues. Attempts to access the UPR property should be documented. Pechiney/Amec must complete this characterization and cleanup, and submit a cleanup completion report for EPA approval.

2. **Restrictive Covenant.** Pechiney or the new owners of the Property must record a restrictive covenant for the Property in accordance with Condition C.9 of the Approval. EPA understands that the Property was recently subdivided into North and South parcels. Ownership of the South parcel has been transferred, and the North parcel will similarly be transferred shortly. Consequently, Condition C.9 for a restrictive covenant applies to the individual parcels on which the Property has been subdivided. EPA is currently reviewing two draft restrictive land use covenants for these parcels.

Consistent with the above review, EPA concludes that no further cleanup of PCBs is necessary within the boundaries of the Property. However, additional characterization and possible cleanup of PCBs on the UPR portion of the Cleanup Site must still be completed. EPA will make a future determination regarding the results of this investigation.

EPA may require additional investigation and cleanup of PCBs if (1) a finding is made after the date of this letter that PCBs above the cleanup levels remain at the PCB Cleanup Site, (2) PCBs are found in other areas adjacent to the Property, and/or (3) the land use is changed to unrestricted use.

EPA appreciates Pechiney's implementation and completion of the PCB cleanup. Please call Nathan Dadap at (415) 972-3654 if you have any further questions.

Sincerely,



Jeff Scott, Director
Waste Management Division

Enclosure:

Table 1. Summary of Key Documents for Pechiney PCB Cleanup Review

cc (e-mail only):

William Adams (Pechiney)
Chand Sultana (DTSC)
Linda Conlan (Amec)

Summary of Key Documents for Pechiney PCB Cleanup Review

Date	Creator	Title/Description
9-Jul-09	Pechiney	Polychlorinated Biphenyls Notification Plan former Pechiney Cast Plate, Inc Facility Vernon, California
2-Jul-10	EPA	USEPA Conditional Approval
16-Mar-10	Amec	Response to US EPA Questions (email dated 1/22/10 and 1/27/10) on the Polychlorinated Biphenyl (PCB) Notification Plan Application
2-Apr-10	Amec	Polychlorinated Biphenyl (PCB) Notification Plan, Risk-Based Application Amendment 2, Proposed Concrete and Soil Sampling Plan for Coplanar Polychlorinated Biphenyl
2-Apr-10	Amec	Polychlorinated Biphenyl (PCB) Notification Plan, Risk-Based Application Amendment 3, Proposed Additional Concrete Sampling Plan for Polychlorinated Biphenyl
29-Dec-10	Amec	Attachment 1 - Impact of Additional Soil and Concrete Characterization on Risk-Based Remediation Goals, December 29
1-Jul-11	EPA	Modification of July 2, 2010 Approval Approving Modified Cleanup Levels
7-May-12	Amec	Remedial Action Plan
26-Sep-14	Amec	Phase V Completion Report
14-Nov-14	Amec	Final Phase I Completion Report
7-Oct-14	Amec	Phase III, IV, and VI Completion Report
7-Nov-14	Amec	Phase II Completion Report
4-Feb-14	EPA	AMEC's Proposed Modifications to USEPA's Approvals

Emails (all attachments considered during review)

Date	From	Subject
31-Mar-15	Amec	"PCBs - Pechiney - Summary of USEPA Conditional Approvals and Information"
27-Apr-15	Amec	"PCBs - Pechiney - Photographs"
5-May-15	Amec	"PCBs - Pechiney - Record Drawing Updates (Structures/UWB Information and Site Grade)"
26-Jun-15	Amec	"Pechiney - PCB ProUCL Summary and Files"
26-Jun-15	Amec	"Pechiney - PCB Data and Figures" (Phase I and V)
16-Jul-15	Amec	"Pechiney - PCB Figures (Phase III IV and VI)"
14-Aug-15	Amec	"Pechiney - PCB Figures (Phase II)"
28-Aug-15	Amec	"Pechiney - Updated APNs"
28-Aug-15	EPA	"Pechiney Call Follow-up and Figure comments"
4-Sep-15	Amec	"RE: Pechiney Call Follow-up and Figure comments - Response to Comments"
16-Sep-15	Amec	"Pechiney - North and South Parcels - Preliminary Building Layouts"
16-Sep-15	Amec	"Pechiney - Proposed Off-site UPRR Soil Sample Locations"
17-Sep-15	EPA	"RE: Pechiney - Proposed Off-site UPRR Soil Sample Locations"

22-Sep-15	Amec	"RE: Pechiney - Revised Soil Management Plan (SMP)"
30-Sep-15	Amec	"RE: Pechiney Call Follow-up and Figure comments - Response to Comments"
6-Oct-15	EPA	"RE: Pechiney Call Follow-up and Figure comments - Response to Comments"
6-Oct-15	Amec	"RE: Pechiney Call Follow-up and Figure comments - Response to Comments"
6-Oct-15	EPA	"Re: Pechiney - Revised Soil Management Plan (SMP)"
9-Oct-15	EPA	"RE: Pechiney - Revised Soil Management Plan (SMP)"
29-Oct-15	Amec	"PCB Results from Step Out Borings East of the Ramp for Soil Removal Area 4A/4B"
5-Nov-15	Amec	"Pechiney - Draft LUC Southern Property and Soil Management Plan (Part 1 of 3)"
5-Nov-15	Amec	"RE: Pechiney - Draft LUC Southern Property and Soil Management Plan (Part 1 of 3)"
5-Nov-15	Amec	"RE: Pechiney - Draft LUC Southern Property and Soil Management Plan (Part 2 of 3)"
5-Nov-15	Amec	"RE: Pechiney - Draft LUC Southern Property and Soil Management Plan - Northern (Part 3 of 3)"
19-Nov-15	Amec	"Pechiney - EPA Call - Attendees"
25-Nov-15	Amec	"Pechiney - Request Letter for Exception to Start Grading and Construction - EPA"
15-Dec-15	Amec	"Pechiney - Ramp Sample Excavation Results and Application for UPRR Sampling"
16-Dec-15	Amec	"RE: Pechiney - Ramp Sample Excavation Results and Application for UPRR Sampling"